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Subject: RE: Patterson v. Popo

From: "Jason R. Mullis" <JMullis@wshblaw.com>

Date: Thu, Jul 09, 2015 4:27 pm

To: "'ps@strojnik.com'" <ps@strojnik.com>

Cc: Eddie Pantiliat <EAP@legalcounselors.com>, Amy Patterson <pattersona82@gmail.com>

I can advise you now that the check will not be available tomorrow as I have not been advised that the checks cleared. Consequently, a check will not be arriving in the pouch from LA tomorrow.

Jason R. Mullis

Partner | Wood, Smith, Henning & Berman LLP
2525 E. Camelback Rd., Suite 450 | Phoenix 85016
jmullis@wshblaw.com | TEL 602.441.1314 | FAX 602.441.1350

From: ps@strojnik.com [mailto:ps@strojnik.com]

Sent: Thursday, July 09, 2015 3:54 PM

To: Jason R. Mullis

Cc: Eddie Pantiliat; Amy Patterson

Subject: RE: Patterson v. Popo

Please advise tomorrow whether the check will be delivered by 5:00 pm so I can make arrangements to file the Renewed Motion is not.

Cordially Yours,

Peter Strojnik
STROJNIK, P.C.
2415 East Camelback Road Suite 700
Phoenix, Arizona 85016
Telephone: 602-524-6602
Facsimile: 602-296-0135
e-mail ps@strojnik.com

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----- Original Message -----

Subject: RE: Patterson v. Popo

From: "Jason R. Mullis" <JMullis@wshblaw.com>

Date: Wed, July 08, 2015 11:12 am

To: "'ps@strojnik.com'" <ps@strojnik.com>

Cc: Eddie Pantiliat <EAP@legalcounselors.com>, Amy Patterson
<pattersona82@gmail.com>

For the record, we never provided any assurances or representations that we would be able to provide a check by July 10th. We advised at the outset that the standard time period is 30-60 days

after receipt of an executed agreement. I further advised last week that the target date would be July 17th based upon the then existing state of facts. This remains the factual reality.

It typically takes 3-5 days for checks to clear, so it will be highly unlikely that we will have the check for you by Friday. Writing a check prior to the check clearing is prohibited by our corporate policy and is a highly risky business practice. If you believe it necessary to file a supplemental motion to enforce despite my assurances that payment will be made within the original time frame quoted at the outset, there is nothing I can do to stop you.

However, please be advised that we will seek our fees and costs responding to any motion to enforce as we have never breached the agreement. Your bully tactics and unilateral deadlines do not change the facts or allow us to provide checks any faster.

Jason R. Mullis

Partner | Wood, Smith, Henning & Berman LLP
2525 E. Camelback Rd., Suite 450 | Phoenix 85016
jmullis@wshblaw.com | TEL 602.441.1314 | FAX 602.441.1350

From: ps@strojnik.com [<mailto:ps@strojnik.com>]

Sent: Tuesday, July 07, 2015 10:46 PM

To: Jason R. Mullis

Cc: Eddie Pantiliat; Amy Patterson

Subject: RE: Patterson v. Popo

I am filing a renewed Motion to Enforce at 5:05 Friday. You have the right to pay out of your trust if the check is from an insurer even if it has not cleared. Take advantage of it.

Cordially Yours,

Peter Strojnik
STROJNIK, P.C.
2415 East Camelback Road Suite 700
Phoenix, Arizona 85016
Telephone: 602-524-6602
Facsimile: 602-296-0135
e-mail ps@strojnik.com

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----- Original Message -----

Subject: Re: Patterson v. Popo

From: "Jason R. Mullis" <JMullis@wshblaw.com>

Date: Tue, July 07, 2015 10:05 pm

To: "ps@strojnik.com" <ps@strojnik.com>

Cc: Eddie Pantiliat <EAP@legalcounselors.com>, Amy Patterson <pattersona82@gmail.com>

If it is available on Friday, I will do so.

Sent from my iPhone

On Jul 7, 2015, at 9:32 PM, "ps@strojnik.com" <ps@strojnik.com> wrote:

The w-9 was requested and received by Rebecca L. Villarreal earlier today.

On the matter of payment, please make sure that the payment is made by 5:00 pm on Friday. In order to facilitate your deliver of the check, please have it delivered to my home address at 7847 N. Central Ave, Phoenix, Arizona 85020. Please have your courier call me on my cell prior to arriving to make sure I am here to accept it.

Cordially Yours,

Peter Strojnik
STROJNIK, P.C.
2415 East Camelback Road Suite 700
Phoenix, Arizona 85016
Telephone: 602-524-6602
Facsimile: 602-296-0135
e-mail ps@strojnik.com

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----- Original Message -----

Subject: RE: Patterson v. Popo
From: "Jason R. Mullis" <JMullis@wshblaw.com>
Date: Tue, July 07, 2015 7:09 pm
To: "'ps@strojnik.com'" <ps@strojnik.com>, Eddie Pantiliat <EAP@legalcounselors.com>
Cc: Amy Patterson <pattersona82@gmail.com>

Please be advised that we received the final settlement funds today. They are being deposited and will be in a position to provide a check when the drafts clear. Based upon experience, this will likely be between 3 and 5 business days.

Please provide an executed W-9 with payment instructions so that the settlement check may be cut when the Farmers checks clear.

Jason R. Mullis

Partner | Wood, Smith, Henning & Berman LLP

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